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Melissa E. Newman
Vice President-Federal Regulatory

Ex Parte

April 11, 2001

RECEIVED

APR 11 2001

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Portals II, Room TW-A325
445 12th Street, S.W.
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: CC Docket No. 96-98 -- February 14, 2001
EELs Provisioning Workshop

Dear Ms. Roman Salas:

On February 14, 2001, representatives of Qwest Corporation (Qwest) attended a workshop hosted by the Federal Communications Commission (Commission) on operational issues involving the conversion of special access circuits to enhanced extended links. As a follow-up to that workshop, in response to the request of Jodie Donovan May, Qwest transmitted the enclosed two memoranda from the undersigned to Ms. Donovan May. These memoranda represent the responses of Qwest to various Action List items that developed as a result of the workshop.

Qwest is filing these two memoranda with the Office of the Secretary to ensure that these responses become part of the record in the CC Docket No. 96-98 proceeding. Please contact me at the above number if you have any questions.

An original and one copy of this letter are being filed with the Commission. In addition, a copy of this letter also is being served on Ms. Donovan May. Acknowledgment and date of receipt of this letter are requested (a second copy is attached for that purpose).

Sincerely,

Melissa Newman

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List A B C D E

MEMORANDUM

DATE: March 9, 2001

TO: Jodie Donovan May

FROM: Melissa Newman, Qwest
Vice President - Regulatory Affairs

RE: Action List from February 14th EELS Workshop

Attached please find Qwest's responses to the "ILEC" items on the Action List developed as a result of the EELs Provisioning Workshop. Please contact me if you required additional information.

QWEST RESPONSES
March 9, 2001

EELs Provisioning Workshop
Action List from February 14, 2001

Goal: Encourage a process that results in the provisioning of a greater number of EEL conversion orders.

Information exchange

(A) Specific Items

(1) Pre-ordering

ILECs provide to CLECs: Can ILECs provide CLECs with a circuit inventory through a batch-type process? Would this speed the provisioning process?

Qwest cannot currently provide batch circuit inventories. Providing batch circuit inventories would require major changes to our billing systems and processes.

Qwest's provision of bulk circuit information (if it could be provided) may or may not speed up the provisioning process. The CLEC still has responsibility for identifying and certifying to which circuits qualify for conversion.

CLECs provide to ILECs: Are circuit IDs included in billing information that CLECs receive? Are there other means that CLECs can use to compile the circuit inventory information?

ILECs provide to CLECs: Can ILECs provide CLECs with escalation lists?

Qwest Account Team representatives are able to provide CLECs with escalation lists.

(2) Costs

ILECs provide to CLECs: Can the conversion costs be identified early in the ordering process?

Qwest has no existing process to identify Termination Liability Assessment (TLA) charges for individual circuits purchased via contract in advance of a conversion. Identification of all conversion costs (including TLA) would need to be negotiated with the Account Team representative and managed as a project on a case by case basis.

(3) Firm dates

ILECs provide to CLECs: Can ILECs provide CLECs with an effective bill date and provide credits back to the billing date, if necessary?

Qwest does not offer a standard Effective Bill Date (EBD) for conversions at this time. The EBD for conversions is determined on an individual case basis when appropriate, based on negotiations between the CLEC and the Account Team representative.

CLECs provide to ILECs: When do CLECs need FOCs or other type of notification that orders are complete?

ILECs provide to CLECs: Can ILECs provide notification of complete orders and in what form?

Qwest establishes a Firm Order Commitment (FOC) date for every Local Service Request (LSR) received from the CLEC, including conversion orders, consistent with intervals contained in Qwest's Service Interval Guide (SIG). The FOC is returned to the CLEC via the same system that the CLEC utilized to submit the LSR. It is assumed that the order will complete on the FOC date unless the CLEC is otherwise notified. Qwest provides CLECs with the option of receiving a "Loss and Completion Report" which contains information regarding completed orders, including EEL conversion orders.

MEMORANDUM

DATE: March 21, 2001

TO: Jodie Donovan May

FROM: Melissa Newman, Qwest
Vice President - Regulatory Affairs

RE: Action List from February 14th EELS Workshop

Attached please find Qwest's responses to the "ILEC Overall Requirements" on the Action List developed as a result of the EELs Provisioning Workshop. Please contact me if you required additional information.

QWEST RESPONSES
March 21, 2001

(B) Overall requirements

CLECs provide to ILECs: What do CLECs need from the ILECs in order to submit conversion orders? Identify in checklist form.

ILECs provide to CLECs: What do ILECs need from CLECs in order to process a conversion order? Identify in checklist form for each ILEC.

Qwest utilizes the Local Service Request (LSR) for conversion orders. Consistent with the OBF standards for LSRs, following is the high level information required to convert a circuit to EEL:

- *CCNA (ZCID)*
- *PON*
- *Billing Account Number*
- *NC (network channel code)*
- *NCI (network channel interface code)*
- *Secondary NCI*
- *Request type, activity, type of service*
- *Summary Bill Information*
- *Remark including certification option number and validation number*
- *Primary location Name and Address*
- *Secondary location Name and Address*
- *Circuit ID*
- *CFA (connecting facility assignment) Information*

Date: Assuming it makes sense for parties to address the specific items identified above before they can compile a complete set of requirements, parties should exchange such requirements by March 21, 2001. Parties can then compile all submissions and give them to Commission staff with a proposed list of topics to be discussed at the next meeting. The meeting will be tentatively scheduled for the end of March, 2001.